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DEPARTMENT OF THE NAVY

ATLANTIC DIVISION
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IN REPLY REFER TO

5090
1823:SGM:cag

JAN 06 2000

West Virginia Department of Environmental Protection (WVDEP)
Office of Environmental Remediation
Superfund Group
Attn: Mr. Ken Ellison
Chief, Office of Environmental Remediation
1356 Hansford St.
Charleston, WV 25301

Re: Allegany Ballistics Laboratory (ABL) Site 1
Groundwater Treatment Plant Discharge letter dated
November 17, 1999

Dear Mr. Ellison:

This is in response to the above referenced letter regarding ammonium perchlorate in the Site 1 groundwater treatment plant discharge at ABL. The WVDEP letter states that the presence of ammonium perchlorate in the discharge constitutes a violation of West Virginia State law and directs the Navy to identify a methodology to reduce or eliminate ammonium perchlorate in the discharge within 45 days with implementation within 180 days.

As you know, ammonium perchlorate was not identified as a contaminant of potential concern during the selection of a remedy for Site 1, or considered at the time the Record of Decision (ROD) was signed. As a member of the ABL team, the Navy is committed to working with all parties involved to address this newly identified contaminant within the framework of the ABL Federal Facilities Agreement. However, we believe that any remedial efforts regarding ammonium perchlorate should synchronize with on-going national efforts to establish a public health goal for drinking water sources and determination of the effects of perchlorate on the ecosystem.

As you may know, EPA established an Interagency Perchlorate Steering Committee (IPSC) in January 1998 to address issues related to perchlorate contamination in the environment. DoD serves as co-chair with EPA on the IPSC, whose membership also includes representatives from the Agency for Toxic Substances and Disease Registry, the National Institute for Environmental Health Sciences, academia, and

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numerous state and local governments. DoD's involvement on the IPSC is evidence of its commitment to assist with the development of scientific information related to perchlorates and to undertake appropriate response actions for DoD sites where perchlorate contamination exists. The IPSC's objective is to coordinate efforts as a collective body and protect the public from a potential threat affecting the water supplies of the nation.

Eight toxicological studies were undertaken by the DoD/perchlorate study group partnership, under the guidance of EPA and state representatives. In February 1999, the EPA hosted an external peer review examining the results of the studies. The peer review panel made specific recommendations on additional information it needed to make sure their advice to the EPA and Public on setting a health standard for an unregulated contaminate would be based on sound and reasonable science. Because the perchlorate issue is being addressed at a national level and the work of the IPSC is not yet complete, we believe any decisions regarding ammonium perchlorate contamination at ABL would be premature at this time.

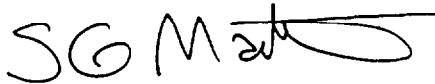
We propose to institute quarterly monitoring for ammonium perchlorate beginning in January 2000. We believe this monitoring, in conjunction with the acute toxicity testing currently required by the Record of Decision, will provide useful data to assess potential impacts of ammonium perchlorate on the Potomac River at the Site 1 discharge point. These changes to the monitoring program will be proposed to the Tier 1 and pending Tier 1 approval, will be formally incorporated into the Site 1 decision documents.

We believe a meeting with the ABL partnering team is needed to provide a briefing on the current status of perchlorate issues on a national scale and how they relate to ABL. We will invite members of the IPSC to this briefing to ensure your questions concerning IPSC efforts are answered. The DoD point of contact for ammonium perchlorate, Lieutenant Colonel Dan Rogers, has agreed to participate. The Colonel may be reached at (501) 987-8162 for any discussion regarding the IPSC you may need in advance of our meeting. His e-mail is drogers@jag.af.mil.

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Please let me know of your availability to meet at your
earliest convenience. I can be reached at (757) 322-4763.

Sincerely,



S. G. MARTIN, P.E.
Head
Installation Restoration Section
(South)
Environmental Programs Branch
Environmental Division
By direction of the Commander

Copy to:

CNRMA (Mr. Steve Olson)
NAVSEA (N45)
NAVSEA (Code 04XI3, Mr. Steve Hoffman)
NAVSEA (Code 00TT, Ms. Carole Watson, Ms. Vicki Ritt)
NAVSEA (Code 00L61, Ms. Mary Bell)
NAVSURFWARCENDIV Indian Head (Mr. Cary Yates)
ASN (I&E) (Messrs. Bernie Schafer, Paul Yaroschak)
DUSD (Mr. Gary Vest, Col John Selstrom)
CNO (N45, Messrs. Dave Olson, Geoff Cullison)
NAVFAC HQ (Messrs. Brian Harrison, Wade Jensen)
AFB Little Rock (LtCol Dan Rogers (DOD))
WVDEP (Mr. Thomas Bass)
CH2M Hill (Mr. Brett Doerr)
EPA Region III (Messrs. Paul Leonard, Bruce Beach)
Administrative Record File (Allegany Ballistics Laboratory, WV)